

## **ELEMENT 7: FATS, OILS AND GREASE (FOG) CONTROL PROGRAM**

The ESD has the responsibility to minimize the amount of FOG that enters the sanitary and storm sewer systems from industrial and commercial sources. Watershed Protection Division manages the FOG program in ESD.

### **Grease Removal Device Plan Checks**

Watershed Protection staff determines the requirements for grease removal devices (GRD). Building plans for new construction or remodeling of a restaurant or food service facility are reviewed and stamped off with any requirements prior to issuance of the plumbing permits. The plans are reviewed along with a questionnaire filled out by the restaurant representative, and the requirement for a GRD is determined.

The plan review process also involves a GRD certification. This certification involves the restaurant representative signing an acknowledgement of GRD requirements. The minimum acceptable cleaning frequency for the type of GRD being required, the on-site maintenance of a schedule and instructions for cleaning, and cleaning records and receipts, are some of the requirements acknowledged in the certification.

The size and type of GRD required is determined based upon the facility's potential for discharging grease in the wastewater. The size of the restaurant, the cooking and cleaning equipment installed, and the number of meals served, are some of the factors considered in order to determine the standard required GRD size. Requirements range from a small grease trap beneath the pot sink to a large in-ground grease interceptor.

Approved grease trap sizes are 40, 50, 70, and 100 pounds. Grease interceptors must be a minimum of 1000 gallons. BMPs may be discussed and distributed to restaurant representatives during the plan check, including kitchen practices to minimize the discharge of grease into the sewer system, maintenance tips for grease traps and interceptors, and record keeping requirements. Building inspectors from the Department of Planning, Building, and Code Enforcement verify the installation and connections of the GRD.

### **Standard Restaurant Inspections**

Watershed Protection staff inspect all restaurants and other food service facilities. Their initial inspection includes determining if the restaurant generates grease, if there is a GRD in place, and reviewing the cleaning records for the GRD, as well as practices used to clean floor mats, vent hoods, and outside areas. Enforcement actions are taken against any restaurant that does not clean their GRD at the minimum set frequency (monthly for grease traps and quarterly for grease interceptors) or keep 3 years of cleaning records. Facilities generating grease are reinspected periodically (every one to three years), depending on the number of areas of concern observed during the inspection. BMPs are distributed to restaurant operators during the inspections, as appropriate, including

kitchen practices to minimize the discharge of grease into the sewer system, maintenance tips for grease traps and interceptors, and record keeping requirements.

### **Investigation of FOG in Sewer Mains**

Watershed Protection Inspectors respond to reports from DOT or other sources that a grease blockage or unusual build-up of grease has taken place in the sanitary sewer. Referrals from DOT are sent from the Maintenance Supervisor or Senior Maintenance Worker to the Senior Environmental Inspector, commonly based on the following reasons:

1. Excessive grease build up.
2. Odor complaints.
3. Request for service.
4. Blockages due to grease.
5. Excessive grease evident during preventative maintenance.
6. Reduced flow.
7. Video Inspection identifies excessive grease.
8. Litigation

The area upstream of the grease build-up is evaluated for potential sources, and inspections of those potential sources are performed. The presence and size of GRD are looked at, and GRD cleaning and maintenance records are reviewed. Enforcement action is taken against establishments determined to be causing grease blockages in the sanitary sewer, and additional requirements for cleaning or installation of GRD can be imposed.

### **Participation in Regional Efforts**

ESD staff participates on regional committees addressing FOG issues, including the California Water Environment Association Pretreatment, Pollution Prevention, and Stormwater Committee's Grease sub-committee, the CalFOG efforts underway to share grease related issues state-wide, and the Bay Area Clean Water Agencies' Collection Systems Committee.

### **Outreach**

A number of outreach pieces are available to distribute information about FOG issues. Grease Management Best Management Practices (6 fact sheets – Grease Trap Maintenance, Grease Interceptor Maintenance, Maintenance Documentation, Power-Operated Grease Removal Devices, Chemicals, Enzymes and Bacteria, Vapor/Ventilation Hood Cleaning, and a poster – Managing Fats, Oils, & Grease, "It's Easier Than You Think") are available to inspectors and plan check staff to distribute to restaurant owners and operators. A bill insert is sent to every residential property in San Jose annually in November with information on residential practices to reduce the quantity of FOG reaching the sanitary sewer. Sewer crews distribute door hangers in areas near grease blockages as appropriate. Regional efforts result in articles in area newspapers and radio spots to promote proper disposal of FOG.